

IN THE UNITED STATES DISTRICT COURT FOR THE
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:22-cr-216
)	
QINBIN CHEN,)	
a/k/a "Ben Chen")	
)	
Defendant.)	
)	

GOVERNMENT'S NOTICE OF PARTICULARS
FOR FORFEITURE OF PROPERTY

COMES NOW the United States of America, by its counsel, Jessica D. Aber, United States Attorney for the Eastern District of Virginia, and Christopher J. Hood, Assistant United States Attorney, and hereby files this Notice of Particulars for Forfeiture of Property with respect to the above-captioned matter to supplement the criminal forfeiture notice in the Indictment returned in this case on November 23, 2022 (Document 1).

The Indictment seeks forfeiture of property upon conviction of the counts therein. The Fourth Circuit has noted that, "[a] bill of particulars is an appropriate way to pinpoint certain assets, noted in the indictment, as subject to forfeiture." United States v. Moffitt, Zwerling & Kemler, P.C., 83 F.3d 660, 665 (4th Cir. 1996). The United States hereby gives notice that, in addition to any property already listed in the forfeiture allegation, the United States is specifically seeking forfeiture of the following property:

\$304,033.99 in funds in an internal Wells Fargo Bank Account holding the balance of Wells Fargo Bank Account # 5323; and

\$278,602.69 in funds in TD Bank Account # 9488, held in the name of Qinbin Chen.

(In accordance with Title 18, United States Code, Sections 982(a)(2)(B), 1029(c)(1)(C), and 982(a)(1) and Title 21, United States Code, Section 853)

Respectfully submitted,

JESSICA D. ABER
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that, on the 15th day of January 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notification of such filing (NEF) to all counsel of record

By: /s/Christopher J. Hood
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